

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO

**TYNISHA WILLIAMS and  
SHAWN BEALER, both individually and  
on behalf of a class of others similarly  
situated.**

Plaintiffs,

V.

THE CITY OF CLEVELAND,

Defendant.

No. 1:09-CV-2991

The Honorable Benita Y. Pearson

**PLAINTIFF TYNISHA WILLIAMS' NOTICE OF MOTION FOR SUMMARY  
JUDGMENT AND PERMANENT INJUNCTION**

**PLEASE TAKE NOTICE THAT**, upon the affirmation of Elmer Robert Keach, III, with Exhibits, and the Plaintiff's Memorandum of Law, the Plaintiff hereby moves this Court for Summary Judgment against the Defendant, and for an Order providing a Permanent Injunction enjoining the City of Cleveland from continuing to physically delouse detainees at the Cleveland Workhouse and from continuing to strip search detainees in groups in the absence of appropriate privacy partitions. In the alternative, the Plaintiff seeks a preliminary injunction ordering this same relief. All briefing in this matter must be filed pursuant to the Court's scheduling order.

The Plaintiff hereby seeks oral argument from the Court on this motion.

Respectfully Submitted By:

/s Elmer Robert Keach, III

Dated: November 9, 2015

Elmer Robert Keach, III, Esquire  
Member of the Bar, USDC, ND Ohio  
LAW OFFICES OF ELMER ROBERT

KEACH, III, PC  
One Pine West Plaza  
Suite 109  
Albany, NY 12205  
Telephone: 518.434.1718  
Telecopier: 518.770.1558  
Electronic Mail:  
bobkeach@keachlawfirm.com

Nicholas Migliaccio, Esquire  
MIGLIACCIO LAW FIRM, PLLC  
438 16<sup>th</sup> Street SE  
Washington, DC 20003  
Telephone: 202.470.3520  
Telecopier: 202.800.2730  
Electronic Mail:  
nmigliccio@classlawdc.com

D. Aaron Rihn, Esquire  
ROBERT PEIRCE & ASSOCIATES, PC  
2500 Gulf Tower  
707 Grant Street  
Pittsburgh, PA 15219  
Telephone: 412.281.7229  
Telecopier: 412.281.4229  
Electronic Mail:  
arihn@peircelaw.com

Daniel Karon, Esquire  
KARON LLP  
700 West St. Clair Avenue  
Suite 200  
Cleveland, OH 44113  
Telephone: 216.622.1851  
Telecopier: 216.241.8175  
Electronic Mail:  
dkaron@karonllc.com

**ATTORNEYS FOR PLAINTIFF  
TYNISHA WILLIAMS**